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April 8, 1988

TO:

File

FROM:

Lynn Kunzler, Reclamation Biologist

RE:

Repermit ICR Review (February 10, 1988 Submittal), Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #2,

Emery Co. Utah

The initial completeness review of the above referenced mine plan shows that the MRP is not complete or adequate for vegetation, land use, revegetation or fish and wildlife information and plans. The following comments need to be addressed prior to determining the MRP complete.

# UMC 783.19 Vegetation Information - 1k

Plate 9-4 does not have the map scale noted

### UMC 783.21 Fish and Wildlife Information - 1k

Plate 10-1 needs to show the location of the Golden Eagle nest that is located ca. .8 km northeast of the portal area (as reported inspection 10.3.3.2 and on page 40 of Item 10-3).

On page 7-36 (section 7.1.5) it states, "that these springs represent an insignificant resource to the local wildlife." Please note, ALL seeps and springs area considered to be of critical value to the local wildlife. The referenced statement needs to be corrected to relay this message (also, refer to comments under UMC 784.21).

Page 3.23 (section 3.4.6.1) states that no fisheries exist within or adjacent to the permit area. This needs to be corrected since fisheries do exist in Huntington Creek and lower Crandall Creek which are adjacent to the tract III lease area and Topsoil Pile #3 (refer to comments under UMC 784.21 as well).

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# <u>UMC 784.13 Reclamation Plan: General Requirements - 1k</u>

There is an acreage discrepancy regarding the area disturbed. Pages 1-3 and 3-11 indicate 5.73 acres to be disturbed while pages 3-27 and 9-5 indicate 6.65 acres disturbed. Please correct this and check to see that it correlates with other locations in the MRP that show disturbed acreage.

There are no seed mixes listed in chapter 9 or in section 3.5.5 (as referenced on pages 3-6 or 3-27) for topsoil protection. Please provide the seed mix(es) that have been used in the past as well as those proposed for future use.

The proposed seed mixes need revision in that they contain several introduced species (with no documentation that the criteria of UMC 817.112 is satisfied) and that there are several species that are not available from commercial seed sources. The Division can assist in modifying your seed mixes to meet current needs.

References on page 3-41 and plates 3-4 and 7-5 indicate that part of the "wooded" area has undergone final reclamation. Please not that the revegetation plans for this area call for the planting of trees and shrubs. The reclamation of this area must be completed during the first (next) available planting season (refer to UMC 817.100).

The standards for revegetation success are not correctly stated on page 3-44. For wildlife habitat, the minimum standards for cover, woody plant density and productivity are 70% of the reference area (standard) with 90% statistical confidence (for cover only) and 90% of the standard with 80% statistical confidence (for density and productivity). Please correct (refer to UMC 817.116).

### UMC 784.15 Reclamation Plan: Postmining Land Use - 1k

In section 4.4.2 (3rd. paragraph), the MRP fails to address wildlife habitat as part of the current land use of the permit area.

Section 4.5 should have a clear statement regarding the proposed postmining land use, that is is proposed to be the same as the premining land use of wildlife habitat with limited (undeveloped) recreation opportunities.

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### UMC 784.21 Fish and Wildlife Plan - 1k

Please provide 'as-built' designs for the power poles that demonstrate that they were constructed to meet raptor protection technology.

The MRP should have a discussion in section 3.4.6.2 regarding the measures implemented to prevent impact to the fisheries that are adjacent to the permit area.

Page 3-25 (section 3.4.6.2) needs to be corrected to accurately describe the seep and spring impacts and mitigation plans as was approved in the tract II modification.

#### Technical Deficiency

## UMC 817.57 Stream Buffer Zones - 1k

The MRP (page 2-6) should state that the stream buffer zone variance was granted and provide documentation in an appendix.

cc: S. Linner J. Leatherwood 1414R/15-17